

AMERICAN CIVIL LIBERTIES UNION OF  
MASSACHUSETTS and LAWYERS FOR  
CIVIL RIGHTS,  
  
Plaintiffs,  
  
v.  
  
UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY, IMMIGRATION  
AND CUSTOMS ENFORCEMENT,  
  
Defendants.

Plaintiffs the American Civil Liberties Union of Massachusetts (“ACLU”) and Lawyers for Civil Rights (“LCR”) (collectively, the “Plaintiffs”), hereby submit the following status update in advance of the status conference scheduled for June 10, 2020. The parties have met and conferred pursuant to the Court’s order, D. 21.

Plaintiffs have not received any additional documents since the last hearing, and Defendants have either (1) refused to commit to deadlines or (2) failed to comply with self-imposed deadlines, including:

Category	Deadline	Status
<b>Completion of Search</b> for documents responsive to Gang Profiling Request	April 1, <sup>1</sup> extended to April 15 <sup>2</sup>	Still outstanding
<b>Document and page counts</b> for number of documents responsive to Gang Profiling Request	April 30 <sup>3</sup>	Still outstanding
<b>Initial Production</b> of documents responsive to Gang Profiling Request	May 30 <sup>4</sup>	Still outstanding
Production of <b>Policy Directives</b> responsive to subpart #10 of Gang Profiling Request	“Soon” as of April 10 <sup>5</sup>	Still outstanding
Firm <b>deadline</b> for completion of production of documents responsive to Gang Profiling Request	N/A	Still outstanding
Firm <b>deadline</b> for completion of production of documents responsive to WSO Request	N/A	Still outstanding

Because Defendants’ own deadlines have not been effective to ensure Plaintiffs receive the requested documents in a timely manner, Plaintiffs request that the Court set firm deadlines for production for both the WSO Request and the Gang Profiling Request.

WSO Request: Defendants report that there are 181 documents totaling 829 pages remaining. Plaintiffs propose that Defendants produce all responsive, non-exempt documents to Plaintiffs by **July 15, 2020**, and produce an accompanying *Vaughn* index by **August 1, 2020**.

<sup>1</sup> D. 13 at 4.

<sup>2</sup> D. 17 at 3.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> Oral representation by counsel for Defendants at 4/10/2020 status conference.

**Gang Profiling Request:** Plaintiffs sent the Gang Profiling Request in June 2019 – a full year ago – and have yet to receive any responsive documents. Plaintiffs propose that Defendants provide document and page counts for responsive documents by **June 12, 2020**. After providing these document and page counts, both Plaintiffs and Defendants should submit supplemental status updates to the court regarding a proposed schedule for completing the production. Plaintiffs further propose that Defendants respond to the following discrete categories of requests by **July 15, 2020**: #4 (East Boston High School documents), #7 (Operation Matador), and #10 (policy directives).

Date: June 5, 2020

Respectfully Submitted,

/s/ Lauren Godles Milgroom\_\_\_\_\_  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing will be filed through the electronic filing system of the Court, which system will serve counsel of record, on June 5, 2020.

/s/ Lauren Godles Milgroom  
Lauren Godles Milgroom